

EXHIBIT 8

From: Houghton-Larsen, M Annie
Sent: Saturday, December 28, 2024 1:00 PM
To: ryan.medrano@giulianipartners.com; Joseph Cammarata, Esq.
Cc: Nathan, Aaron E.; Governski, Meryl Conant
Subject: RE: Freeman v. Giuliani - Motion to Compel Documents // Deposition Subpoena

Mr. Medrano,

I am writing again regarding your upcoming deposition that was properly noticed for December 31, 2024 in New York. As I explained last week, we are planning for your deposition—this includes hiring a court reporter and a videographer, organizing meals, and asking Willkie staff to be in the office and working during the holiday week. **To the extent you do not plan to appear at the deposition, we ask that you please advise us now, so that we may cancel these efforts and avoid the unnecessary burden, expense, and inconvenience (including to third parties).** If you do not respond to this email and do not appear on December 31, we reserve the right to seek relief with the Court relating to the failure to appear or to mitigate our costs.

Additionally, we remind you that you have not complied with the Court's order to respond to Plaintiffs' motion to compel you to produce documents responsive to Plaintiffs' document subpoena by 12 p.m. on December 26. Given this failure, Plaintiffs intend to write the Court to advise that Plaintiffs' motion should be granted in full.

Thank you,

M. Annie Houghton-Larsen
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Pronouns: she, her, hers

From: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>
Sent: Monday, December 23, 2024 5:36 PM
To: ryan.medrano@giulianipartners.com; Joseph Cammarata, Esq. <Joe@CammarataLawPC.com>
Cc: Nathan, Aaron E. <ANathan@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>
Subject: RE: Freeman v. Giuliani - Motion to Compel Documents // Deposition Subpoena

Mr. Medrano,

You were properly served with a deposition subpoena noticing your deposition for December 31, 2024 in New York. I am reattaching a copy of that subpoena here, with a corrected case caption, but no other changes. As such, we are planning for your deposition—this includes hiring a court reporter and a videographer, organizing breakfast and lunch, and asking Willkie staff to be in the office and working during the holiday week. **To the extent you do not plan to appear at the deposition, we ask that you please advise us now, so that we may cancel these efforts and avoid the unnecessary burden, expense, and inconvenience (including to third parties).** If you do not respond to this email and do not appear on December 31, we reserve the right to seek relief with the Court relating to the failure to appear or to mitigate our costs.

Thank you,

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From: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>
Sent: Friday, December 20, 2024 5:38 PM
To: ryan.medrano@giulianipartners.com
Cc: Nathan, Aaron E. <ANathan@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>
Subject: RE: Freeman v. Giuliani - Motion to Compel Documents // Deposition Subpoena

Mr. Medrano,

The Court issued another order today (attached) requiring that your deposition occur before December 31, 2024 if Mr. Giuliani intends to have you testify at trial (which his counsel has represented to us that he does). To that end, I am attaching an updated deposition subpoena for December 31, 2024 at 787 Seventh Avenue, New York, NY at 9 a.m. If that location is not amenable, please advise and we can accommodate your needs.

Thank you,
Annie

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From: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>
Sent: Friday, December 20, 2024 1:15 PM
To: ryan.medrano@giulianipartners.com
Cc: Nathan, Aaron E. <ANathan@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>
Subject: Freeman v. Giuliani - Motion to Compel Documents // Deposition Subpoena

Mr. Medrano,

I write pursuant to a Court-order permitting us to serve you with various papers by alternative means. In addition to this email, we will also be providing the same materials by certified mail to your home address. Attached to this email are the following:

- Plaintiffs' motion to compel your production of documents pursuant to the previously-served subpoena, and accompanying materials
- The Court's order permitting alternative service of you and directing your response to Plaintiffs' motion to compel
- A deposition subpoena for your deposition on January 6, 2025

Thank you,

M.Annie Houghton-Larsen
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